



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Arizona Department of Corrections
CTD: 21-10-02
Site: Success Academy - Lewis

Contacts: Jason Monson, Warden & Theresa Stewart, Business Administrator

Review Date: May 22, 2025 and May 28, 2025

Exit Conference Date: May 28, 2025

Review Period: April 2025

Programs Reviewed:

- National School Lunch
- School Breakfast
- Afterschool Snack
- Fresh Fruit & Vegetable
- Special Milk
- At-Risk Afterschool Meals

No.	Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
Performance Standard 1: Certification and Benefit Issuance – Critical Area			
<i>No Findings.</i>			
Performance Standard 1: Meal Counting and Claiming – Critical Area			
1	Breakfast service observed on the day of review did not support that reimbursable meal counts are accurate. Specifically, attendance counts were used in place of reimbursable meal counts. This was deemed a systemic error and contributed towards fiscal action calculations. A full recalculation of breakfasts served for the months of July 2024-May 2025 was conducted at Success Academy - Lewis.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. Discussed implementing a policy that ensures all inmates attend meal service as well as a revised counting form all staff know to fill out accurately.	<i>Changes to the procedures of meal counting and claiming have been made. A fiscal recalculation of breakfasts was conducted using counts from 30 operating days utilizing new counting and claiming procedures.</i>
2	Meal count totals were not correctly combined and recorded at lunch during the review period. This was deemed a non-systemic error and did not contributed toward fiscal action calculations.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal count totals are correctly combined and recorded, including the date of implementation.</i>

Performance Standard 2: Meal Components & Quantities – Critical Area

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| <p>3 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1.75 oz eq meat/meat alternate was served on April 7, 2025, during the week of review when 2 oz eq meat/meat alternate is required daily at lunch for grades 9-12. This was not a repeat finding from the previous cycle and therefore did not contribute toward fiscal action calculations.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that daily meat/meat alternate quantities at lunch meet minimum amounts required by the meal pattern.</i></p> |
| <p>4 Food quantities observed at lunch on the day of review did not meet minimum amounts required by the meal pattern. Specifically, 1.75 oz eq meat/meat alternate was served on May 28, 2025, during the day of review when 2 oz eq meat/meat alternate is required daily at lunch for grades 9-12. This was not a repeat finding from the previous cycle and therefore did not contribute toward fiscal action calculations.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that daily meat/meat alternate quantities at lunch meet minimum amounts required by the meal pattern.</i></p> |

Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area

No Findings.

Meal Access & Reimbursement: Certification and Benefit Issuance

No Findings.

Meal Access & Reimbursement: Verification

No Findings.

Meal Access & Reimbursement: Meal Counting and Claiming

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| 5 | Daily edit checks are not being conducted appropriately. Specifically, the attendance factor used on the breakfast daily edit check did not match the attendance factor provided by the State agency as reflected on the claim for reimbursement. Additionally, a daily edit check for lunch was not provided. | Discussed how to complete daily edit checks using ADE's Daily Edit Check worksheet. The Daily Edit Check Worksheet can be found on ADE's website at on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion. The Step-by-Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. | <i>Please provide a completed daily edit check worksheets for the most recently submitted claim month. Additionally, please provide written assurance that the attendance factor reflected on the daily edit check worksheet will be updated annually.</i> |
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Meal Pattern & Nutritional Quality: Offer Versus Serve

Not Applicable.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

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| 7 | Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast and lunch. | Discussed feasible options for signage and potential content as well as the plan for creating and posting near the point of service. Printable reimbursable meal signage can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. | <i>Please provide the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast and lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |
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Resource Management

No Findings.

General Program Compliance: Civil Rights

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| 8 | Participants are not made aware of Limited English Proficiency (LEP) services provided by the school food authority. | Discussed requirement that once aware of an LEP individual's needs, the LEA is responsible for ensuring that their application and other participant materials are available in the language the LEP individual can understand. Referred to SP 37-2016 which can be found on ADE's Memos webpage at https://www.azed.gov/hns/memos . | <i>Please provide a written description of how participants with limited English proficiency are made aware of the services available to them.</i> |
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| 9 | Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, complaints are handled internally when they are required to be sent to an external agency. | Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., ADE, Food & Nutrition Services Southwest Regional Office, FNS Office of Civil Rights, or USDA Office of Civil Rights). The SFA's procedures must note whether an allegation is made verbally or in person. The SFA staff member receiving the allegation must transcribe the complaint. The SFA's procedures for receiving a complaint cannot prevent a complaint from being accepted. Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Additional guidance can be found on ADE's website at https://www.azed.gov/hns/civilrights . The Step-by-Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. | <i>Please provide a written description of the updated process and procedures for processing complaints alleging discrimination which meets requirements. Additionally, the certificate of completion of Step-by-Step Instruction: How to File a Civil Rights Complaint must be submitted.</i> |
| 10 | The Civil Rights Compliance Form is not being completed every year by December 15 and kept on file. | Discussed requirement for completing form and how to collect racial/ethnic data from program participants. The form can be found on ADE's website at https://www.azed.gov/hns/civilrights . The Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. | <i>Please provide a written description of how the Civil Rights Compliance form will be completed by December 15 each year and maintained, including the individual who will be responsible for completing the form. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form must be submitted.</i> |
| 11 | The "And Justice for All" poster was not displayed in a prominent location and was not visible to all program participants. | Discussed requirements of where poster must be placed and where to find a printable "And Justice For All" poster on ADE's website at https://www.azed.gov/hns/civilrights . Referred to HNS 08-2019 USDA Nondiscrimination And Justice for All Poster Clarification. | <i>Please provide pictures to demonstrate the posters are now displayed in a prominent location and visible to all program participants. Additionally, please provide written assurance that the "And Justice For All" poster has been displayed in a prominent location and visible to all program participants.</i> |

General Program Compliance: SFA On-Site Monitoring

Not Applicable.

General Program Compliance: Local Wellness Policy

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| 12 | The Local Wellness Policy did not contain all required elements. Specifically, the Local Wellness Policy did not contain a description of public involvement. | Discussed that local wellness policies are required to include a description of public involvement, public updates, policy leadership, and evaluation plan. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training accordion. | <i>Please provide a written plan for how a description of public involvement will be added to the Local Wellness Policy. The plan should include draft language of the element to be added, who will be involved in updating the Local Wellness Policy and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i> |
| 13 | The public is not being notified of the existence and contents of the Local Wellness Policy. | Discussed feasible means of notifying the public about the Local Wellness Policy such as posting it on the school website. Perhaps, adding a food service page to the current website to include the Local Wellness Policy activities as discussed. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training accordion. | <i>Please provide a written description of how the public will be notified of the existence and contents of the Local Wellness Policy.</i> |
| 14 | The review and update of the Local Wellness Policy, as specified in the policy itself the Local Wellness Policy is not occurring nor is documentation being kept on file to support this. Specifically, the Local Wellness Policy indicates that it will be updated annually and documentation to support this was not provided. | Discussed why the review and update is not occurring and what can be done to ensure this occurs as specified in the Local Wellness Policy. Discussed maintaining records to document compliance. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training accordion. | <i>Please provide a written description of how the Local Wellness Policy will be reviewed and updated as well as how reviews and updates will be documented.</i> |
| 15 | Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy. Specifically, the general public was not made aware of their ability to participate in the development, review, and update of the Local Wellness Policy. | Discussed feasible means of notifying potential stakeholders of their ability to participate. Perhaps, utilizing a Local Wellness Policy email address as discussed. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training accordion. | <i>Please provide a written description of how all potential stakeholders, including general public, will be made aware of their ability to participate in the development, review, update, and implementation of the Local Wellness Policy.</i> |

16 A recent assessment of the implementation of the Local Wellness Policy has not been conducted nor have plans been developed to complete the assessment.	Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must measure how the LEA is complying with their Local Wellness Policy, how the LEA's Local Wellness Policy compares to the model wellness policy, and progress made in attaining the goals of the wellness policy. Additionally, discussed feasible means for notifying the public of the results of the most recent assessment. Sample evaluation tools can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Local Wellness Policy accordion. Local Wellness Policy Assessment: Making it Meaningful Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training accordion.	<i>Please provide a written plan for conducting an assessment of the implementation of the Local Wellness Policy. This plan must include who will be designated as the oversight official, who will be invited to participate in the assessment process, and the date by which the assessment is expected to be completed.</i>
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General Program Compliance: Competitive Food Services

Not applicable.

General Program Compliance: Professional Standards

17 The School Nutrition Program Director hired on or after July 1, 2015 did not complete the required 8 hours of food safety training within 30 days of being hired or within 5 years prior to hire date.	Discussed requirement and feasibility for attending an available certification training within current school year. Food Safety Online Training Library can be found on ICN's website at https://theicn.org/icn-resources-a-z/food-safety/ .	<i>Food safety certification was completed by School Nutrition Program Director on May 10, 2024. No further corrective action is required.</i>
18 The School Nutrition Program Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.	Discussed 12 hour requirement and feasibility for attending upcoming applicable trainings. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch and School Breakfast Program can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Build Your Employees Training Plans accordion. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that the School Nutrition Program Director is registered for. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i>
19 Professional Standards training hours are not being adequately tracked. Specifically, there is no comprehensive tracking system in place. Employee trainings are received through a variety of sources (in person and through multiple software programs) and while these records are kept separately there is no system to combine trainings and ensure that hours are met per employee annually.	Discussed feasibility of different tracking methods for the school year. Suggested creating their own training tracker with all required information or upgrading current software system which does provide a sufficient tracking report. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Please provide a written description of how Professional Standards training hours will be tracked and utilized to ensure that all School Nutrition Program staff meet their training requirements.</i>

20 Staff tasked with National School Lunch Program procurement responsibilities have not completed annual training on Federal procurement standards.	Discussed that school nutrition program directors, management, and staff tasked with National School Lunch Program procurement responsibilities must complete annual training on Federal procurement standards annually. Additionally discussed that procurement training may count towards the professional standards training standards. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch and School Breakfast Program can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Build Your Employees Training Plans accordion. Procurement Basics training can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Please provide the certificate of completion of Procurement Basics (or an equivalent training on Federal procurement standards) for Staff tasked with National School Lunch Program procurement responsibilities. Additionally, please provide written assurance that annual training on Federal procurement standards will be completed annually.</i>
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General Program Compliance: Water

No Findings.

General Program Compliance: Food Safety, Storage and Buy American

21 A copy of the written food safety plan was not accessible during meal preparation and service. Specifically, the food safety plan was digital and was not easily accessible during meal preparation and service.	Discussed that the written food safety plan should be easily available at each food preparation and food service site and that staff should be aware of its existence.	<i>Please provide a written description of where the food safety plan is located at Success Academy - Lewis. Additionally, please provide written assurance that a copy of the written food safety plan will be accessible to staff during meal preparation and service at each site.</i>
22 The most recent food safety inspection report was not posted in a prominent location visible to all program participants.	Discussed making copies of most recent report and feasible places for posting, such as the main dining area, meal service line, school bulletin board, or front office.	<i>Please provide a photo demonstrating that the most recent food safety inspection report has been posted in a location where the program participants can view it. Additionally, please provide written assurance that it will be updated each time the school receives a food safety inspection.</i>
23 The following products observed at Success Academy - Lewis were in violation of the Buy American Provision (i.e., were non-domestic) and documentation justifying a Buy American exception were not maintained on file: Green Peppers (Mexico), Apple Juice (USA, China, Chile Turkey, Mexico, Spain & Poland), and Grape Juice (USA, Chile, Argentina).	Discussed that funds used from the nonprofit school food service account must be used to procure food products that comply with the Buy American Provision. Additionally discussed procedures for documenting a Buy American exception. Referred to SP38-2017, Buy American Webinar and FAQ. Additional information on the requirements of this provision, including ADE's prototype Buy American exception document, can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion. Buy American Recorded Webinar and FAQ can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Please provide a written description of the changes that have been made to procurement and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i>

General Program Compliance: Reporting and Recordkeeping

24 Production record crediting is inaccurate. Specifically, the following items did not reflect correct crediting information: Peanut Butter and Jelly Sandwich.	Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Additionally discussed that crediting information is not a required element of a production record and therefore is not required to be included on the production record. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.	<i>Please provide a written description of changes made to ensure crediting is correctly reflected on production records. If the operation chooses not to include the optional crediting information on the production record moving forward, please provide production records for 5 consecutive days demonstrating that it is no longer included.</i>
25 Production records did not contain all required sections. Specifically, the production records for breakfast and lunch did not contain milk or fruit varieties.	Discussed required sections of production records. Production Record Templates can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Please provide copies of completed breakfast and lunch production records for 5 consecutive days.</i>

General Program Compliance: School Breakfast Program and Summer Food Service Program Outreach

26 Participants were not notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year.	Discussed methods of notifying participants of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year and determined which was most feasible. Summer feeding locations can be found at https://www.azhealthzone.org/ .	<i>Please provide a written description of how participants will be notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year, including the documentation that will be used for the notification. Additionally, please provide written assurance that this will occur at the end of each school year.</i>
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Other Federal Program Reviews: Afterschool Snack Program

Not Applicable.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2025 if applicable.

Other Federal Program Reviews: Fresh Fruit and Vegetable Program

Not Applicable.

Other Federal Program Reviews: Special Milk Program

Not Applicable.

Other Federal Program Reviews: At-Risk Afterschool Meals

Not Applicable.

Comments/Recommendations:

Congratulations! Arizona Department of Corrections has completed the administrative review for the 2024-2025 school year. Thank you for your hospitality, organization, and sense of urgency during the review process. Your team works marvelously together in order to do an outstanding job implementing the National School Lunch Program and School Breakfast Program. It is evident that you are working hard to ensure your students are fed healthy, delicious meals in a supportive environment.

To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at <https://www.azed.gov/hns/nslp/forms> under the Calendars and Checklists tab.

